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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Federal Communications Commission
Office of Secretary

In the Matter of)

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Federal-State Joint Board on
Universal Service)

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CC Docket No. 96-45

Comments of

THE UNITED STATES CATHOLIC CONFERENCE, NATIONAL COALITION FOR
THE HOMELESS, WASHINGTON LEGAL CLINIC FOR THE HOMELESS,
AMERICAN WOMEN'S ROUNDTABLE, CENTER FOR MEDIA EDUCATION,
CONSUMER ACTION, FIFTH STREET CONNECTION, HEARTLAND ALLIANCE
FOR HUMAN NEEDS AND HUMAN RIGHTS, INTERSTATE MIGRANT
EDUCATION COUNCIL, NATIONAL ASSOCIATION OF MIGRANT
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SUMMARY

United States Catholic Conference *et al.* urge the Commission, in implementing Universal Service, to go beyond the recommendations of the Joint Board in a few discrete respects. Specifically, the Commission should promote access to telecommunications service for people who lack a residential line by substituting voice messaging for telephone service. In determining the services eligible for Universal Service support, the Federal-State Joint Board failed to include people who lack access to a residential telephone line, primarily homeless persons and migrant farmworkers who urgently need access to telecommunications services to find and keep jobs and to communicate with providers of medical care, education, and social services.

The Commission should construe Section 254(b) of the Telecommunications Act of 1996 to guarantee quality services to all people living in the United States, including those without a residential line. These services should be extended through the use of voice messaging, which meets the criteria in Section 254(c) for services which are eligible for universal service support. The Commission should further guarantee telecommunications services to homeless persons by extending Lifeline support to shelters that serve persons who would qualify for the program if they had a residential line. The Commission should ensure that Lifeline is extended to all qualified persons by protecting Lifeline eligibility from changes brought about by new federal welfare provisions and by widely disseminating information about the program. Finally, the Commission should adopt the portions of the Joint Board's Recommended Decision that increase services to low-income consumers.

I. The Commission Should Include in the Definition of Universal Service, Access to Telecommunications Services for People who Lack a Permanent Residential Line Such as Homeless Persons and Migrant Farmworkers.

The Joint Board declined to include in the definition of Universal Service certain services needed to ensure basic telecommunication capabilities for a significant segment of the United States population: homeless persons and migrant farmworkers. While the Joint Board acknowledged our comments on this issue,¹ it declined to adopt any special protections for these groups finding that “there is no evidence that Congress intended this Joint Board and the Commission to take additional steps to segment consumers into additional categories.”² This conclusion misconstrues both the arguments made in our earlier Comments as well as Congressional intent.

A. Section 254(b)(1) Should Be Construed Broadly to Guarantee Quality Telecommunications Service to All People Living in the United States.

The Joint Board characterizes our comments as requesting “special consideration,” i.e. that our proposal become an *additional principle* under Section 254(b).³ However, our argument was not that services to those lacking a residential line should be an additional principle, but that a correct reading of Section 254(b)(1) already includes services for all persons living in the United States, regardless of their housing status.

¹ Recommended Decision of the Federal-State Joint Board on Universal Service, CC Docket No. 96-45, released Nov. 8, 1996, ¶ 19 (“Catholic Conference contends that the homeless and migrant workers should be given special consideration because they have no access to residential telephones.”)[hereinafter Recommendations].

² Therefore, our proposal would be excluded because the Joint Board recommended that no principles be established in addition to those enumerated in Section 254(b) and the principle of competitive neutrality. Recommendations at ¶ 25.

³ Recommendations at ¶ 23.

The Communications Act of 1934, as amended by the Telecommunications Act of 1996 (the Act) states that it is the policy of the United States “to make available, so far as possible, to *all the people of the United States*, without...discrimination a rapid, efficient, nationwide, and world wide...communication service.”⁴ This policy must guide the Commission’s interpretation of Section 254(b)(1), which provides that “Quality services should be available at just, reasonable, and affordable rates.”⁵ Thus, 254(b)(1) already mandates that the Commission ensure the availability of quality services for all consumers without regard to their residential status. Indeed, the Joint Board concludes that the “underlying principle requiring ‘just, reasonable and affordable rates’ is applicable to all consumers.”⁶ Yet, it inexplicably excludes those consumers who lack residential lines. The Commission should make clear that homeless persons and migrant workers are also entitled to the same protections under the law as persons with permanent residences.

B. Including Homeless Persons and Migrant Farmworkers under Section 254(b) is Consistent with Congressional Intent.

Taking steps to ensure access to telecommunications services for homeless persons and migrant farmworkers would not contravene Congressional intent. Indeed, although not mentioned in the Joint Board’s Recommendation, several members of Congress wrote to the Joint Board to support the extension of service to homeless persons and migrant workers.⁷

⁴ 47 U.S.C. § 151 (1996) (emphasis added).

⁵ 47 U.S.C. § 254(b)(1).

⁶ Recommendations at ¶ 25.

⁷ See Letters to FCC Chairman Reed Hundt from Senator Herbert Kohl (October 24, 1996), Representative William L. Clay (November 1, 1996), Representative Edolphus Towns (October 25, 1996), and Representative Bill Richardson (November 1, 1996).

Some members of Congress identified the connection between having telephone service and getting a job. For example, Senator Kohl of Wisconsin asked the Joint Board to consider the merits of implementing a program similar to the one in his state which provides voice messaging for homeless people looking for jobs.

Homeless people face a daunting task in trying to become self-sufficient. They find it impossible to find housing without a job, and impossible to get a job without having a telephone number to list on a job application. In our important effort to move people from welfare to work, we must ensure that homeless people have access to the basic tools of communication that are vital to their success.⁸

The White House's Interagency Council on the Homeless, which is comprised of the heads of 18 Federal departments and agencies, also expressed its support of voice messaging for homeless persons.⁹ The Commission should consider the support expressed by Members of Congress and the Interagency Council for the proposition that homeless persons and migrant farmworkers should be extended substitute means of telecommunications where they lack a residential line.

- C. Because the Joint Board Misconstrued Section 254(b) and Our Argument that Universal Service Should Include All People, the Board Failed to Reach Our Argument that Providing Telecommunications Services to People who Lack Permanent Residences Meets the Four Criteria in Section 254(c)(1).

The Joint Board should have construed Section 254(b)¹⁰ to extend telecommunications services to all people living in the United States, including those who lack access to a residential

⁸ Letter from Senator Herbert Kohl to Chairman Reed Hundt (October 24, 1996).

⁹ Letter from Fred Karnas, Jr, Acting Executive Director, Interagency Council on the Homeless to Chairman Reed Hundt (November 5, 1996).

¹⁰ 47 U.S.C. § 254(b).

line. Had it done so, it would have then reached the question of whether offering voice messaging as a substitute for telephone service meets the criteria of Section 254(c).¹¹

The Joint Board concluded that “no other services proposed by commenters in the record substantially meet the criteria in Section 254(c)(1).”¹² While the Joint Board enumerated more than a dozen services which failed to meet the criteria of 254(c)(1),¹³ the Board did not address our argument that voice messaging meets the criteria. The inclusion of such a lengthy list implies that services, including voice messaging for persons who lack a residential line, which were not listed were, in fact, not considered. As the Commission considers the Joint Board’s recommendations, we request that it consider the arguments made in our comments¹⁴ that voice messaging for people who lack access to a permanent residential line meets the criteria of section 254(c)(1).

Voice messaging for homeless persons and migrant farmworkers clearly meets the first criterion, that it is essential to education, public health, or public safety, because it ensures that these persons can communicate with schools, health care providers, and social service agencies. Because voice messaging is a substitute for telephone service, which is subscribed to by 94% of

¹¹ The Joint Board and the Commission “shall consider the extent to which such telecommunications services -- (1) are essential to education, public health or public safety; (2) have been subscribed to by a substantial majority of residential customers; (3) are being deployed in public telecommunications networks; and (4) are consistent with the public interest, convenience, and necessity.” 47 U.S.C. § 254(c)(1)(A-D).

¹² Recommendations at ¶ 70.

¹³ See Recommendations at ¶¶ 57-70.

¹⁴ See Reply Comments of the United States Catholic Conference, In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, May 7, 1996.

all residential customers,¹⁵ voice messaging meets the second criterion, that it has been subscribed to by a substantial majority of residential customers. Moreover, voice messaging itself is also widely subscribed to by residential customers.¹⁶ Voice messaging meets the third criterion, that it is deployed in public telecommunications networks by telecommunications carriers because all RBOCs offer voice mail to their customers.¹⁷ Finally, voice messaging meets the fourth criterion, that it is consistent with the public interest, convenience, and necessity because it enables persons who would otherwise lack access to the telecommunications network to move into the mainstream by communicating with prospective employers, landlords and government agencies. While we believe that all four criteria are met in this case, we agree with the Joint Board's recommendation that all four of these criteria must be *considered*, but not necessarily met, in order to be included within the definition of Universal Service.¹⁸ Thus, we urge the Commission to find that voice messaging for persons who lack a residential line meets the criteria of Section 254(c).

¹⁵ Jorge Reina Schement, Beyond Universal Service, May 1994, 2.

¹⁶ In May 1995, Pacific Bell Information Services reported that in California, demand for residential and business voice messaging was growing at thirty five percent per year. Sidewire, Telecomworldwire, May 15, 1995. As of March 1995, Bell Atlantic's Answer Call voice messaging service, the largest in the country, reached 1.4 million residential customers. Mike Mills, Montgomery to Get Phone Message Service: Bell Atlantic's Residential 'T-Mail' Experiment is First in Country, Wash. Post, Mar. 17, 1995 at F-1. Other telephone companies have reported similar findings. Tom Michele, Telephone Company Keeps Stride with Progress, Rhinelander Daily News, Feb. 13, 1995, at A-1 (reporting approximately 48% of Rhinelander Telephone Companies 1994 voice mail growth was from residential customers).

¹⁷ Voice Mail Hits the Home Front, San Francisco Chronicle, July 16, 1990 at C-1.

¹⁸ Recommendations at ¶ 46.

D. The Commission Should Provide Voice Messaging for Persons Lacking a Residential Line Through Subsidies to Shelters and Social Service Agencies.

We further urge that voice mail be provided to homeless persons and migrant farmworkers by means of subsidies to shelters and social service agencies, such as migrant councils, that serve these populations. Subsidization of telecommunications services will allow shelters to serve more clients, thus fulfilling the national mandate that all people have access to telecommunications services.

Universal service support to shelters and migrant councils could be administered in the same way as support to schools and libraries consistent with the Joint Board's recommendations. Specifically, shelters and migrant councils could self-certify that they are eligible for discounted services by submitting a plan, similar to the plan required for schools and libraries pursuant to paragraph 630 of the Recommendations.

In the alternative, Lifeline could be expanded to subsidize telecommunications services to persons who lack access to a permanent residential line. The Joint Board found that "Congress's intent would best be served if all low-income consumers had access to Lifeline assistance."¹⁹ With incomes averaging less than \$200 a month, many shelter and migrant council patrons would qualify for Lifeline based on their eligibility for a state-administered welfare program if they had access to a residential line.²⁰ Because many homeless persons and migrant farmworkers meet the qualifications for Lifeline subsidies, except that they lack a residential line, the shelters and migrant councils that aid them should be eligible to receive the subsidy to provide the

¹⁹ Recommendations at ¶ 425.

²⁰ See *Priority: Home! The Federal Plan to Break the Cycle of Homelessness*, Department of Housing and Urban Development, May 1994, HUD-1454-CPD(1).

service. Rather than finding, as the Joint Board did, that Lifeline should be extended only to one residential line,²¹ the Commission should extend the service to shelters and social service agencies.

II. In Revising the Lifeline Program, the Commission Should Go Beyond the Joint Board's Recommendations to Promote Access to Telecommunications Services for All Americans.

Low income Americans have historically faced a myriad of obstacles seeking access to telecommunications including high service deposits, loss of local service for nonpayment of toll calls, and lack of information about telecommunications services. Therefore, Commenters urge the Commission to adopt the portion of Joint Board's recommendations that address these problems by improving access to telephone service to low income groups through expansion of Lifeline and Link Up.

First, we strongly support the Joint Board's recommendation that the Commission prohibit states from restricting the number of service connections per year for which low-income consumers who relocate can receive Link Up support. As discussed in our previous comments,²² it is vital for low-income consumers, such as those moving in and out of homelessness, who may need to initiate telephone service more than once in a year. Also benefitting from this recommendation are migrant farmworkers who often move several times in a year to follow the

²¹ Recommendations at ¶ 427 ("Support would be available only for the primary residential line.").

²² See Comments of United States Catholic Conference *et al.* April 12, 1996, at 22 and Comments of the National Coalition for the Homeless, August 2, 1996, at 7. See also Recommendations at ¶ 410 ("Catholic Conference would amend Link Up to provide assistance for more than one initiation of service per year.").

crops. If they are fortunate enough to have access to housing with a residential line, they will likely need to initiate service more than once in a year.

We also support the Joint Board's recommendations to expand Lifeline and Link Up to every state and territory, to increase federal support for Lifeline, to offer low-income consumers access to the same services designated for support in rural, insular, and high cost areas, to eliminate charges for access to toll blocking and toll limitation, to prohibit carriers from requiring Lifeline subscribers to pay service deposits when subscribers volunteer for toll blocking, and to prohibit carriers from disconnecting a Lifeline customer's local service for non-payment of toll charges.

Nonetheless, we urge the Commission to make additional modifications to the Lifeline program beyond those limited modifications proposed by the Joint Board.²³ Additional modifications are needed to realize the guarantee of universal service for all Americans.

A. The Commission Should Take Steps to Ensure that Changes in Federal Welfare Laws Do Not Deny Low Income Subscribers Eligibility for Lifeline.

The Joint Board recommended that eligibility for Lifeline should be contingent upon participation in low-income assistance programs such as state administered welfare programs.²⁴ However, the Joint Board did not take into account new welfare reform provisions which require

²³ Recommendations at ¶ 394 (“[W]e limit our recommendation to the services and rules described *supra* and the modifications to Lifeline and Link Up described *infra*.”).

²⁴ Recommendations at ¶ 425.

states to administer federal welfare funds pursuant to severe restrictions on eligibility²⁵ which could potentially eliminate some low income participants from the Lifeline program.

States retain the ability to use their own funds to provide benefits to any low-income populations they wish, as long as the funds are not mixed with federal funds. However, states may choose to combine their current state welfare programs with the new federal block grants, thus subjecting all beneficiaries of state welfare programs to potentially harsher federal eligibility rules. This outcome would be devastating to low-income populations currently eligible for Lifeline based on eligibility for federal welfare assistance. If all low income consumers who lose eligibility for welfare assistance eventually lose eligibility for Lifeline, the Commission's goal of serving all low income consumers will be thwarted, with a significant drop in subscribership. Among the adverse effects, low income consumers will be hampered in their search for employment, health care, and social services.

The Commission should study the potential effects of the new eligibility rules and, if it is determined that some states will administer only one fund, with a combination of state and federal money, the Commission should impose a federal eligibility rule to ensure that low income consumers retain Lifeline assistance. One potential solution could be for the Commission to impose a straight income level, adjusted by state, for Lifeline eligibility.

²⁵ See the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, P.L. 104-193. Among other things, the welfare reform provisions limit eligible families to no more than five years consecutive or nonconsecutive assistance (Title I), make legal immigrants ineligible for assistance for the first five years of residence (Title IV, Sec. 403), and prohibit federal public benefits such as supplemental security income (SSI), food stamps, temporary assistance for needy families, social services block grants, and Medicaid to be extended to legal immigrants (Title IV, Sec. 402).

B. The Commission Should Ensure that Information About Low Income Services to Consumers is Widely Available.

The Joint Board recommended that states determine "whether to require carriers to provide free access to information about telephone service for low-income consumers...."²⁶ However, a state rule will not ensure the same high level of information dissemination across the country. This is important for homeless persons who need information to gain access to telecommunications services and ultimately use those services to communicate with individuals and agencies who can help them join the mainstream of society. Information dissemination is vital for migrant workers who need to learn, as they pass from state to state, how to access telecommunications services so that they can find out where the next crop is, keep in touch with children's' school teachers, or find medical care. As we have argued previously,²⁷ the Commission should require service providers to widely distribute literature in various languages, run public service announcements on television and radio and use other means to disseminate information about available service and subsidies. The Joint Board must also adopt a means to collect information regarding the success of these initiatives once adopted. All of these steps are needed to ensure that migrant farmworkers, homeless persons, and other low income consumers have meaningful access to telecommunications service.

²⁶ Recommendations at ¶ 390.

²⁷ Comments of United States Catholic Conference *et al.*, April 12, 1996 at 22.


CONCLUSION

The Commission should define Universal Service to include all people living in the United States, rather than only those with residential lines. Services should be provided to homeless persons and migrant farmworkers through substitutes for residential telephone service, such as voice messaging. Further, the Commission should expand Lifeline to provide subsidies to homeless shelters whose residents would qualify for the program if they had access to a residential line. The Commission should disseminate consumer information about Lifeline to increase its penetration among low-income communities, and should study the potential for new welfare legislation to strip Lifeline eligibility from low-income consumers. Finally, the Commission should adopt the Joint Board's proposals to expand the Lifeline and LinkUp programs.

Respectfully submitted,

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December 19, 1996

CERTIFICATE OF SERVICE

I, John Podesta, hereby certify that I have this 19th day of December, 1996, mailed by first class United States mail, postage prepaid, copies of the foregoing Comments of the United States Catholic Conference *et al.* in the matter of "Federal-State Joint Board on Universal Service," CC Docket No. 96-45 to the following:

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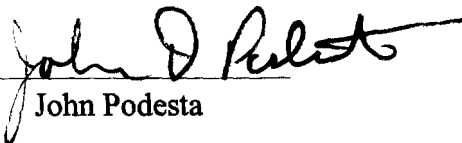
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